

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

NATIONWIDE RECOVERY, INC.,  
a Michigan corporation,

Plaintiff/Counter-Defendant,

vs.

Case No. 2:17-cv-12378  
Hon. Linda V. Parker  
Mag. Jdg. Stephanie Dawkins Davis

CITY OF DETROIT,

Defendant/Counter-Plaintiff,

---

CITY OF DETROIT,

Third-Party Plaintiff,

vs.

JERRY PARKER, an individual,  
HUSSEIN M. HUSSEIN, an individual,  
LOUAY M. HUSSEIN, an individual,  
MARC DELDIN, an individual,  
SKY LINE ENTERPRISE 1.0, INC.,  
a Michigan corporation, d/b/a METROTECH  
AUTO SALES & COLLISION, and  
METROTECH AUTO SALES, LLC,  
a Michigan limited liability company,

Third-Party Defendants.

---

**MARC DELDIN (P71041)**

Deldin Law  
Attorneys for Nationwide Recovery,  
Inc., Parker, L. Hussein, H. Hussein,  
Sky Line Enterprise 1.0, Inc.  
48 S. Main, Suite 3  
Mount Clemens, Michigan 48043  
(586) 741-8116  
marc@deldinlaw.com

**MELVIN BUTCH HOLLOWELL, JR. (P37834)**

**CHARLES N. RAIMI (P29746)**  
City of Detroit, Law Department  
Attorneys for City of Detroit  
2 Woodward Ave., Suite 500  
Detroit, MI 48226  
(313) 237-5037  
hollowellm@detroitmi.gov  
raimic@detroitmi.gov

**DAVID C. ANDERSON (P55258)**  
**MICHAEL J. SULLIVAN (P35599)**  
Collins Einhorn Farrell, PC  
Attorneys for Marc Deldin  
4000 Town Center, 9<sup>th</sup> Floor  
Southfield, MI 48075  
(248) 355-4141  
david.anderson@ceflawyers.com

**RONALD G. ACHO (P23913)**  
**BRANDAN A. HALLAQ (P81056)**  
Cummings, McClorey, Davis & Acho, P.L.C.  
Attorneys for City of Detroit  
17436 College Parkway  
Livonia, MI 48152  
(734) 261-2400  
racho@cmda-law.com  
bhallaq@cmda-law.com

**TERI L. DENNINGS (P68884)**  
Deldin Law  
Attorneys for Metrotech Auto Sales, LLC  
48 S. Main, Suite 3  
Mount Clemens, Michigan 48043  
(586) 741-8116  
teri@deldinlaw.com

---

**NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE**

**NOW COMES** Defendant/Counter-Plaintiff and Third-Party Plaintiff the City of Detroit, by and through its attorneys, The City of Detroit Law Department and Cummings, McClorey, Davis & Acho, P.L.C., and files this Notice of Voluntary Dismissal Without Prejudice, pursuant to Fed. R. Civ. Pro. 41(c)(1), with respect to all Counterclaims and Third-Party Claims asserted by The City of Detroit in this action.

Respectfully submitted,

CUMMINGS, McCLOREY, DAVIS & ACHO, P.L.C.

By: /s/ Ronald G. Acho  
RONALD G. ACHO (P 23913)  
*Attorneys for Defendant/Counter- Plaintiff and  
Third Party Plaintiff City of Detroit*  
17436 College Parkway  
Livonia Michigan 48152  
(734) 261-2400

Dated: October 16, 2017

CITY OF DETROIT, LAW DEPARTMENT

By: /s/ Charles N. Raimi  
Charles N. Raimi (P29746)  
*Attorneys for Defendant/Counter- Plaintiff and  
Third Party Plaintiff City of Detroit*  
2 Woodward Ave., Suite 500  
Detroit, MI 48226  
(313) 237-503

Dated: October 16, 2017

**CERTIFICATE OF SERVICE**

I hereby certify that on October 16, 2017, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification to all counsel of record and I hereby certify that I have mailed by United States Postal Service the paper to the following non-ECF participants: N/A

/s/ Ronald G. Acho  
RONALD G. ACHO